

IN THE
UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
vs.)	NO. 07 CR 792
)	
KEITH WILSON,)	Honorable Joan B. Gottschall
)	District Judge, Presiding
Defendant.)	

MOTION FOR LEAVE TO FILE
ADDITIONAL PRE-TRIAL MOTIONS

NOW COMES the Defendant, KEITH WILSON, by and through his attorney, STEPHEN M. KOMIE of KOMIE AND ASSOCIATES, and respectfully moves this Honorable Court for leave to submit additional pre-trial motions based upon the results of pre-trial discovery within a reasonable time after the grounds for such motions have been ascertained.

The ground of this motion is that discovery agreed to by the Government and/or requested by the Defendant may lead to information presently unknown to the Defendant or counsel which would provide the basis for action by the Court prior to trial.

WHEREFORE the Defendant respectfully requests the Court enter an order for leave to submit additional pre-trial motions.

Respectfully submitted,

KEITH WILSON, Defendant
by and through his attorneys,
KOMIE AND ASSOCIATES

By: /s/ Stephen M. Komie
Komie and Associates
One North LaSalle Street, Suite 4200
Chicago, Illinois 60602
312/263-2800